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6 UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

7 UNITED STATES OF AMERICA,

8 Plaintiff,

9 v.

10 AARON DANIEL AUNG,

11 [REDACTED]  
12 [REDACTED]

13 Defendants.

INDICTMENT 2:24-CR-106-TOR-1

Vio.: 18 U.S.C. § 371  
Conspiracy to Commit  
International Parental  
Kidnapping  
(Count 1)

18 U.S.C. §§ 1204, 2  
International Parental  
Kidnapping  
(Count 2)

15  
16 The Grand Jury charges:

17 COUNT 1

18 On or about May 2024 and continuing until on or about July 7, 2024, in the  
19 Eastern District of Washington, and elsewhere, including Mexico, the Defendants

20 AARON DANIEL AUNG, [REDACTED],

21 INDICTMENT – 1

1 knowingly combined, conspired, confederated, and agreed to commit an offense  
2 against the laws of the United States, that is, international parenting kidnapping, in  
3 violation of 18 U.S.C. §1204, all in violation of 18 U.S.C. § 371.

4 OVERT ACTS

5 In furtherance of the conspiracy and to effect the object, the conspirators  
6 committed numerous over acts in the Eastern District of Washington and  
7 elsewhere, including the following:

- 8 1. On or about May 29, 2024, AARON DANIEL AUNG conducted a custody  
9 exchange of Minor Victim, with Minor Victim's mother, Samara Harmon, at  
10 the Pullman, Washington police station.
- 11 2. On or about May 29, 2024, AARON DANIEL AUNG retrieved a Cadillac  
12 registered to [REDACTED], from a storage unit at Inland Boat and  
13 RV Storage, in Athol, Idaho.
- 14 3. On or about May 29, 2024, [REDACTED] left the Seattle-Tacoma  
15 International airport, where she had checked in for a scheduled flight, to  
16 meet AARON DANIEL AUNG and Minor Victim and travel to Mexico.
- 17 4. On or about May 30, 2024, AARON DANIEL AUNG traveled with Minor  
18 Victim through the Eastern District of Washington, into the Western District  
19 of Washington, where he met up with [REDACTED] at a  
20 predesignated location, in Tacoma, Washington.

1 5. On or about June 1, 2024, AARON DANIEL AUNG [REDACTED]

2 [REDACTED] crossed the border to Mexico with Minor Victim.

3 6. On or about June 3, 2024, AARON DANIEL AUNG failed to return Minor  
4 Victim to Minor Victim's lawful parent Samara Harmon, at the designated  
5 location in Pullman, Washington, pursuant to the parenting plan then in  
6 place.

7 7. On or about May 31, 2024, through June 16, 2024, [REDACTED]  
8 assisted AARON DANIEL AUNG in avoiding law enforcement detection  
9 by exchanging coded/encrypted messages and warning AARON DANIEL  
10 AUNG about the ongoing investigation and how to avoid detection.

11 8. On or about June 1, 2024, until July 4, 2024, AARON DANIEL AUNG and  
12 [REDACTED] remained in Mexico with Minor Victim, contrary to  
13 Samara Harmon's parental rights.

14 COUNT 2

15 On or about June 1 through July 7, 2024 in the Eastern District of  
16 Washington and elsewhere, including Mexico, the Defendants AARON DANIEL  
17 AUNG, [REDACTED] did remove Minor  
18 Victim from the United States and retain Minor Victim outside of the United States  
19 with the intent to obstruct the lawful exercise of another person's parental rights,  
20 and did aid and abet the same, in violation of 18 U.S.C. §§ 1204, 2.

1 DATED this \_\_\_\_\_ day of August 2024.

2 A TRUE BILL

3  
4 \_\_\_\_\_  
Foreperson

5 \_\_\_\_\_  
Vanessa R. Waldref  
United States Attorney

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7 \_\_\_\_\_  
Rebecca R. Perez  
Assistant United States Attorney

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